



FEBRUARY 6, 2009

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S. W., Suite CY-B402
Washington, D.C. 20554

**RE: CERTIFICATION OF CPNI FILING, MARCH 1, 2009
FCC Docket EB 06-36
EB-06-TC-060
BLUE VALLEY TELE-COMMUNICATIONS, INC.**

In accordance with the Public Notice issued by the Enforcement Bureau on February 2, 2006 (DA 06-258), please find attached Blue Valley Tele-Communications, Inc. annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI)

Should you have any questions regarding this filing, please direct them to the undersigned at (785)799-3311 or email ddoyle@bluevalley.net

Sincerely,



DENNIS DOYLE, GENERAL MANAGER
BLUE VALLEY TELE-COMMUNICATIONS, INC.

Cc: Best Copy and Printing, Inc., 445 12th Street, Suite CY-B402, Washington, DC 20554

1559 Pony Express Highway • Home, Kansas 66438 • Phone 785-799-3311 • Fax 785-799-3530

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 6, 2009

Name of company(s) covered by this certification: Blue Valley Tele-Communications, Inc.

Form 499 Filer ID: 806661

Name of signatory: Dennis Doyle

Title of signatory: General Manager

I, Dennis Doyle, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Attachment A
Statement Concerning Procedures Ensuring Compliance with CPNI Rules

The operating procedures of Blue Valley Tele-Communications, Inc. (Form 499 Filer ID No. 806661) ensures that the Company complies with Part 64, Section 2001 *et.seq.* of the FCC rules governing the use of Customer Proprietary Network Information ("CPNI").

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisors/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.